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January 8, 2002

Ms. Emily S. DeRocco  
Assistant Secretary  
U.S. Department of Labor  
Employment and Training Administration  
200 Constitution Avenue NW  
Washington, D.C. 20210

Dear Ms. DeRocco:

On behalf of the South Carolina Employment Security Commission, the administrative entity for the Workforce Investment Act (WIA), I am requesting a waiver of the Eligible Training Provider List requirement for subsequent eligibility that all mandated performance items must be submitted and acceptable levels met for programs/courses to remain on the List.

The majority of training providers on the Eligible Training Provider List requested extensions through 12/31/01, primarily because data was not available to meet subsequent eligibility requirements. This was due to the following factors:

- Many providers do not have systems in place or manpower available to produce the required performance information in the specified timeframe. These include Continuing Education providers, who are not required to collect performance information on students. Also, short-term training providers, such as those who offer computer skills upgrading, are not traditionally geared towards the collection of performance data.
- There have been no WIA participant enrollments in many programs on the List to produce WIA performance data.
- Insufficient time has elapsed for those WIA participants enrolled in training programs to exit and be eligible for the follow-up performance measures.

Some providers requested extensions because some or all of the performance data items did not meet the minimum performance levels, which the State allowed each local area to set.

We understand the critical importance of performance information in meeting the WIA principles of consumer choice and provider accountability. However, removing programs/courses from the List, because the provider is unable to produce sufficient data for subsequent eligibility or minimum performance levels cannot be met for each measure, would decrease our List by at least 50%. This would certainly go against the intent of WIA by severely limiting consumer choice

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in our State. Currently, South Carolina's Eligible Training Provider List has 71 training providers at 99 locations with 1768 programs/courses available. This large variety of programs is necessary for successful workforce development in our State to help serve the training needs of the existing and emerging workforce.

I am requesting this waiver be granted through June 30, 2003, in order to allow additional time for:

- The State, local areas and training providers to collaborate and coordinate together to develop systems for data collection, and/or review alternative sources of data
- Training providers to compile the required data
- WIA participants to enter and exit the system to produce WIA student data.
- Performance levels to be brought up for new and existing programs.

Pending the 12/31/01 extension deadline, we have requested local area administrators to submit any partial data that is available for training providers that do not have all the required performance data for subsequent eligibility, and a written justification for the missing data.

The challenges of implementing the workforce investment system in South Carolina during the previous year have made a significant impact on the delivery of job training, employment and educational services offered in our State. The availability of a significant number of competent training providers offering a wide variety of training programs and occupational choices on the Eligible Training Provider List is of key importance to the continued success of this new system.

Any questions concerning this request should be directed to Sam Jordan at (803) 737-2789 or email to [sjordan@sces.org](mailto:sjordan@sces.org).

Respectfully Submitted,



C. Michael Mungo  
Executive Director

CMM/des  
ES-5  
cc: Anna Goddard